

# EXHIBIT A

## Jason Mizrahi

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**From:** Jason Mizrahi  
**Sent:** Thursday, May 29, 2025 11:02 AM  
**To:** Emanuel Kataev  
**Cc:** Joshua Levin-Epstein  
**Subject:** RE: Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]  
**Attachments:** 2025-0507 Consent to Mag..pdf; 2025-0507 Cheeks Letter.docx; 2025-0507 Settlement Agreement.doc; 2025-0507 Proposed Stip. of Dismissal.docx

Hi Emanuel,

Just a courtesy reminder.

If we do not receive a redline / proposed final executable Settlement Agreement or Cheeks letter by COB today (5/29) we are seeking Court intervention.

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Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2458  
New York, NY 10170  
Office: (212) 792-0048  
Mobile: (301) 758-7351  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

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**From:** Jason Mizrahi  
**Sent:** Wednesday, May 28, 2025 9:46 AM  
**To:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** RE: Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]

Emanuel,

Respectfully, this is a straightforward agreement, that contains all of the material terms that your client had previously committed to, in accepting the Judge's mediator's proposal.

The consent to magistrate and the cheeks letter can be easily marked up by counsel, without the need to meet-and-confer with your client.

Our client is concerned about the delays here.

If we do not receive a redline / proposed final executable Settlement Agreement or Cheeks letter by COB tomorrow (5/29) we are seeking Court intervention.

Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
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Office: (212) 792-0048  
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Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

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**From:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Sent:** Tuesday, May 27, 2025 6:03 PM  
**To:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** RE: Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]

I connected with him over the weekend but we could not schedule a time to review given the time zone difference as he is out of the country. I am actively working on it.



**Emanuel Kataev, Esq.**

ADMITTED IN NEW YORK,  
NEW JERSEY,  
AND CONNECTICUT



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(718) 489-4155 (facsimile)  
(917) 807-7819 (cellular)  
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Greenvale, NY 11548-1057  
📍 1981 Marcus Avenue, Suite C129  
New Hyde Park, NY 11042-1017

📍 1515 Old Northern Boulevard  
Roslyn, NY 11576-1127  
📍 162 Broadway, 2nd Floor  
Amityville, NY 11701-2704

📍 18211 Jamaica Avenue  
Jamaica, NY 11423-2327  
📍 7247 139th Street  
Flushing, NY 11367-2321

**From:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Sent:** Tuesday, May 27, 2025 5:50 PM  
**To:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** RE: Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]

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Emanuel,

Good afternoon. Please let me know where we stand, to avoid Court intervention.

Please let me know when we can expect to receive a proposed final executable Settlement Agreement, and Checks letter.

Separately, please execute, and remit back, the consent to magistrate form and stipulation of dismissal.

Thank you

Thank you.

---

Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2458  
New York, NY 10170  
Office: (212) 792-0048  
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**From:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Sent:** Friday, May 23, 2025 9:56 AM  
**To:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** Re: Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]

Done

Emanuel Kataev, Esq.  
Sage Legal LLC  
Sent from my iPhone

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**From:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Sent:** Friday, May 23, 2025 9:55:38 AM  
**To:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** Re: Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]

He reached out to me yesterday. I will schedule a meeting with him today or on Monday and get this stuff.

Emanuel Kataev, Esq.  
Sage Legal LLC

Sent from my iPhone

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**From:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Sent:** Friday, May 23, 2025 9:48:12 AM  
**To:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** RE: Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]

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Emanuel,

Good morning. I am following up here. I believe this is my seventh attempt.

Please let me know when we can expect to receive a proposed final executable Settlement Agreement, and Checks letter.

Separately, please execute, and remit back, the consent to magistrate form and stipulation of dismissal.

If we do not receive comments by Tuesday (5/27), we will be seeking Court intervention, and will be pursuing the litigation.

Thank you,

---

Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2458  
New York, NY 10170  
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Mobile: (301) 758-7351  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

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**From:** Jason Mizrahi  
**Sent:** Wednesday, May 21, 2025 9:50 AM  
**To:** 'Emanuel Kataev' <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** RE: Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]

Emanuel,

Good morning. I am following up here. I believe this is my sixth attempt.

Please let me know when we can expect to receive a proposed final executable Settlement Agreement, and Checks letter.

Separately, please execute, and remit back, the consent to magistrate form and stipulation of dismissal.

Thank you

---

Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
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New York, NY 10170  
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**From:** Jason Mizrahi  
**Sent:** Monday, May 19, 2025 9:15 AM  
**To:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** RE: Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]

Emanuel,

Good morning. We haven't heard back from you here. Is everything okay?

Please let me know when we can expect to receive a proposed final executable Settlement Agreement, and Checks letter.

Separately, please execute, and remit back, the consent to magistrate form and stipulation of dismissal.

Thank you

---

Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2458  
New York, NY 10170  
Office: (212) 792-0048  
Mobile: (301) 758-7351  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

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**From:** Jason Mizrahi  
**Sent:** Friday, May 16, 2025 11:04 AM  
**To:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** RE: Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]

Emanuel,

Good morning.

As you mentioned below, please get me comments on the attached:

1. Proposed Settlement Agreement, with accompanying Confessions of Judgment;
2. Proposed Checks Letter;

Separately, please execute, and remit back, the consent to magistrate form and stipulation of dismissal.

Thank you.

---

Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2458  
New York, NY 10170  
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**From:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Sent:** Tuesday, May 13, 2025 10:56 AM  
**To:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** Re: Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]

Not yet. In court today. Will do what I can to get to you by Friday.

Emanuel Kataev, Esq.  
Sage Legal LLC  
Sent from my iPhone

---

**From:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>

**Sent:** Tuesday, May 13, 2025 10:54:21 AM

**To:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>

**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>

**Subject:** RE: Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]

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Emanuel,

Please let us know whether you have had a chance to review the attached:

1. Proposed Settlement Agreement, with accompanying Confessions of Judgment;
2. Proposed Cheeks Letter;
3. Proposed Stipulation of Dismissal; and a
4. Proposed Consent to Magistrate Form.

Please let me know if you have any edits to the Settlement Agreement, or Cheeks Letter. Otherwise, please have your client execute the Settlement Agreement, and complete, sign, and notarize the Confessions of Judgment.

Separately, please execute, and remit back, the consent to magistrate form and stipulation of dismissal.

Thank you.

---

Jason Mizrahi, Esq.  
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New York, NY 10170  
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---

**From:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>

**Sent:** Friday, May 9, 2025 9:20 AM

**To:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>

**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>

**Subject:** Re: Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]

I've had court appearances every day and have not yet had an opportunity to review with my client. I will do so as soon as possible

Emanuel Kataev, Esq.  
Sage Legal LLC  
Sent from my iPhone

---

**From:** Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Sent:** Friday, May 9, 2025 9:16:53 AM  
**To:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** RE: Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]

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Emanuel,

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See attached:

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2. Proposed Cheeks Letter;
3. Proposed Stipulation of Dismissal; and a
4. Proposed Consent to Magistrate Form.

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Separately, please execute, and remit back, the consent to magistrate form and stipulation of dismissal.

Thank you.

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Mobile: (301) 758-7351  
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**From:** Jason Mizrahi  
**Sent:** Wednesday, May 7, 2025 4:02 PM  
**To:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** Hernandez v. Happy Street LLC et al [1:22-cv-06918-DG-TAM]

Emanuel,

See attached:

1. Proposed Settlement Agreement, with accompanying Confessions of Judgment;
2. Proposed Cheeks Letter;
3. Proposed Stipulation of Dismissal; and a
4. Proposed Consent to Magistrate Form.

Please let me know if you have any edits to the Settlement Agreement, or Cheeks Letter. Otherwise, please have your client execute the Settlement Agreement, and complete, sign, and notarize the Confessions of Judgment.

Separately, please execute, and remit back, the consent to magistrate form and stipulation of dismissal.

Thank you.

---

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Office: (212) 792-0048  
Mobile: (301) 758-7351  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

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